

East Chicago Sanitary District

# 2018 Annual Report

**EAST CHICAGO SANITARY DISTRICT 2018 ANNUAL REPORT**

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## EAST CHICAGO SANITARY DISTRICT 2018 ANNUAL REPORT

The status regarding Industrial Discharge Permits maintained by the East Chicago Sanitary District (District) for 2018 is as follows.

### **Permitted Industrial Users**

The District has 23 Industrial Users (IUs) permitted to discharge into the City of East Chicago sewer system. This includes five Categorical IUs (CIUs) [Electric Coating Technologies (#312), TAC East, Inc. (#415), National Processing (#514), Lakeshore Railcar LLC (#521) and Safety-Kleen Systems (#901)]. Along with the five CIUs, three additional IUs [W. R. Grace (#401), US Steel Corporation (#936) and US Gypsum (#951)] are classified as Significant IUs (SIUs). One permit, Kemira Water Systems (#702), was terminated in 2017 in accordance with their request, as they no longer have any industrial discharges to the sewer system. One other IU, Central States Marketing #421 discontinued its operations as of September 1, 2018.

In 2018, prior to the issuance of revised permits to all IUs, the District renewed two permits including Electric Coatings Technologies #312 and Safety-Kleen Systems #901.

Each of the permitted IUs was informed on November 15, 2018 that their permits were to be amended to include new local limits that were adopted by Ordinance by the City of East Chicago. In 2017, the District prepared a local limit study for modification and/or elimination of its local discharge limits and submitted it for review and approval by USEPA and IDEM. The District provided public notice of the proposed changes, addressed all comments that were received, and resubmitted the final local limit study and revised Sewer User Ordinance (SUO) and Enforcement Response Plan (ERP) to USEPA for final approval. The local limit study and proposed local limit changes were approved by USEPA in a letter dated July 3, 2018, with final approval contingent upon the City of East Chicago's adoption of the local limits into its Ordinances.

On November 13, 2018, the Common Council of the City of East Chicago (Council) approved by resolution Ordinance 18-0017 - An Ordinance to Amend and Restate the City of East Chicago Sewer User Ordinances and Regulations. The Ordinance was adopted to comply with the requirements of the Administrative Consent Order between the United States Environmental Protection Agency (USEPA) and the East Chicago Sanitary District (District) [Docket No. V-W-15-AO-01]. The Ordinance was executed by Mayor Anthony Copeland on November 14, 2018, the effective date of the Ordinance.

The Sewer User Ordinance included new local limits that are presented in table below. With respect to the

new local pre-treatment limits, the list of local limit parameters appearing in Section 13.13.3.02.3 of Ordinance 07-0007 has been shortened from 20 parameters to 15. Five parameters eliminated from the local limit list are chromium (total), silver, thallium, residual chlorine, and fluoranthene. Of the 15 remaining parameters, the local limits for 12 have been raised in value (which has the effect of facilitating compliance), and three (mercury, zinc, total and bis (2-ethyl-hexyl) phthalate) remain unchanged. The local limit of most interest, available cyanide, was raised from 0.003 mg/L to 0.019 mg/L. Each of the IUs was informed that the new local limits were effective immediately.

| <b>Local Limit Pollutant</b> | <b>2007 Ordinance No. 06-007 Local Limits (Former Limits) (mg/L)</b> | <b>2018 Ordinance No. 18-0017 Newly Adopted Local Limits (mg/L)</b> |
|------------------------------|--|---|
| Ammonia                      | 77   | 134   |
| Arsenic                      | 0.5  | 1.31  |
| Bis (2-ethylhexyl) phthalate | 1.03   | 1.03  |
| Cadmium                      | 0.14   | No limit  |
| Chlorine (Residual)          | 0.4  | No limit  |
| Chromium                     | 0.282  | 7.0   |
| Copper                       | 0.17   | 0.88  |
| Cyanide (Available)          | 0.003  | 0.019   |
| Fluoranthene                 | 0.69   | No limit  |
| Fluoride                     | 2.9  | 30  |
| Lead                         | 0.224  | 2.28  |
| Mercury                      | 0.0002   | 0.0002  |
| Molybdenum                   | 0.2  | 2.8   |
| Nickel                       | 0.39   | 0.80  |
| Oil & Grease                 | 50   | 117   |
| Phenols (4-AAP)              | 0.7  | 0.96  |
| Phosphorous                  | 5.5  | 31  |
| Silver                       | 0.05   | No limit  |
| Thallium                     | 4.3  | No limit  |
| Zinc                         | 5.5  | 5.5   |

The District issued new modified permits incorporating the newly adopted local limits to each of the IUs in January 2019.

Attachment I summarizes the dates of the inspections, SPCC plan requirements and permit expiration dates.

The District inspected 15 of the permitted outfalls. Five closed permitted facilities were not inspected; Exxon Mobil (#121), CMA Recycling (#423), Kemira Water Solutions (#702) Indiana Radiator (#731) and ArcelorMittal IN Harbor West (#933), as there were no active operations at either facility. No inspection was completed at Central States Marketing #421 as they ceased operations in September 2018 and were no longer going to discharge to the City's sewer. Other facilities not inspected include Buckeye Terminals (#124), USS Lead Refinery (#411), ICO Polymers (#518), Tradebe Treatment & Recycling (#561), Arcelor Mittal (#611, #931, #934 and #935) and US Steel Corp (#936).

### **Inspections and Monitoring**

Attachment II summarizes the compliance monitoring events, industrial self-monitoring events and inspections completed at the 15 permitted outfalls. There were 269 separate compliance monitoring events performed by the District. A total of 81 monitoring events completed were at the five Categorical Industrial Users (CIUs): Electric Coating Technologies #312 (12), TAC East, Inc. #415 (12), National Processing #514 (12), Lakeshore Railcar LLC #521 (24) and Safety-Kleen Systems #901 (21). A total of 26 self-monitoring events were performed by each of the five CIUs as well as USS Lead #411 and Arcelor Mittal #936. Only one compliance monitoring event was performed at GATX #112 as this facility was not in operation for the majority of the year and only had one monthly reported discharge in the 2018 calendar year. Sampling was performed only once at Buckeye Pipeline #124 as their discharge is performed on an as-needed basis. No sampling was performed Tradebe #561 as this facility did not have any industrial discharges during the 2018 calendar year.

### **Enforcement Actions & Compliance Status**

The District issued written Notices of Violations (NOVs) and fines to 12 different IUs for 57 violations as noted in the table below. All of the NOVs issued with respect to exceedances of the local limit for residual chlorine did not include any fine as the residual chlorine concentration of the municipal water supply to the facility was found to have an elevated residual chlorine concentration and was determined that it likely contributed to the observed exceedance.

The number of violations and the analytical parameter of concern for each IU are summarized below.

**East Chicago Sanitary District  
Compliance Status Report  
Report Date Range: 1/1/2018 - 12/31/2018**

| Var No | Variable                                | Violations | Limit Description   | Limit    |
|--------|---|------------|---------------------|----------|
| 52192  | 312 Available Cyanide (mg/L)            | 1          | Daily Maximum Limit | >=0.004  |
| 57191  | 415 Amen. Cyanide (mg/L)                | 4          | Daily Maximum Limit | >0.004   |
| 57421  | 415 Total Copper (Cu) (mg/L)            | 1          | Daily Maximum Limit | >0.17    |
| 58191  | 421 Amen. Cyanide (mg/L)                | 1          | Daily Maximum Limit | >=0.004  |
| 58199  | 421 Cl2 Residual (mg/L)                 | 2          | Daily Maximum Limit | >0.4     |
| 60171  | 514 Phenol (mg/L)                       | 1          | Daily Maximum Limit | >0.7     |
| 60199  | 514 Cl2 Residual (mg/L)                 | 1          | Daily Maximum Limit | >0.4     |
| 61191  | 518 Amen. Cyanide (mg/L)                | 1          | Daily Maximum Limit | >=0.004  |
| 61199  | 518 Cl2 Residual (mg/L)                 | 3          | Daily Maximum Limit | >0.4     |
| 62161  | 521 FOG (mg/L)                          | 1          | Daily Maximum Limit | >36      |
| 62191  | 521 Amen. Cyanide (mg/L)                | 7          | Daily Maximum Limit | >=0.004  |
| 62199  | 521 Cl2 Residual (mg/L)                 | 2          | Daily Maximum Limit | >0.4     |
| 63191  | 531 Amen. Cyanide (mg/L)                | 2          | Daily Maximum Limit | >=0.004  |
| 64191  | 541 Amen. Cyanide (mg/L)                | 1          | Daily Maximum Limit | >=0.004  |
| 66031  | 611 Field pH (su)                       | 1          | Daily Maximum Limit | >10      |
| 66199  | 611 Cl2 Residual (mg/L)                 | 1          | Daily Maximum Limit | >0.4     |
| 70151  | 901 Ammonia NH3N (mg/L)                 | 1          | Daily Maximum Limit | >77      |
| 70191  | 901 Amen. Cyanide (mg/L)                | 17         | Daily Maximum Limit | >=0.004  |
| 70199  | 901 Cl2 Residual (mg/L)                 | 3          | Daily Maximum Limit | >0.4     |
| 70461  | 901 Total Mercury (Hg) (mg/L)           | 2          | Daily Maximum Limit | >0.00029 |
| 76141  | 951 Total Phosphorus (mg/L)             | 1          | Daily Maximum Limit | >5.5     |
| 76191  | 951 Amen. Cyanide (mg/L)                | 2          | Daily Maximum Limit | >=0.004  |
| 77611  | 411 Bis (2-ethylhexyl) phthalate (mg/L) | 1          | Daily Maximum Limit | >1.03    |
|        |   |            |                     |          |
|        |   |            |                     |          |

Total 57

The characterization of the compliance status of each IU is provided in Attachment III. Several IUs experienced repeated violations but demonstrate they had achieved compliance with their permitted discharge requirements with follow-up sampling. Two IUs that experienced chronic violations included Safety-Kleen Systems (#901) and Lakeshore Railcar Service (#521). Because of their historical record of repeat and chronic violations, both Safety Kleen and Lakeshore Railcar are typically monitored on a twice a month basis. Safety-Kleen Systems was identified as having chronic violations with respect to cyanide discharges on 17 separate occasions. Lakeshore Railcar exceeded the cyanide local limit on seven occasions. These two facilities accounted for over half of the CN violations observed in 2018. The 24 cyanide violations recorded for Safety-Kleen #901 and Lakeshore Railcar #521 accounted for 66% (24 of 36 total CN violations) of all 2018 violations. Residual chlorine was the second leading violation (20). All other analytes were exceeded less than three times during the year.

The number of cyanide and residual chlorine violations are biased high for a number of reasons. First, with respect to cyanide, the local limit that was developed in 2007 was improperly calculated and resulted in an extremely low discharge value of 0.003 mg/L. As noted previously, the local limit study and proposed local limit changes were approved by USEPA in a letter dated July 3, 2018, with the incorporation of the revised local limits in a City Ordinance on November 13, 2018. The raising of the local CN limit from 0.003 mg/L to 0.019 will significantly reduce the number of reported CN violations going forward. In addition, because of the more

frequent sampling of the chronic violations for CN, the number of exceedances is higher.

Attachment IV summarizes the NOV's issued as well as the fines assessed to each IU. As summarized in the attachment, \$74,500 in fines was levied for the 2018 violations. With the exception of fines associated with the CN violations by Safety-Kleen Systems all assessed fines were paid. Safety-Kleen Systems has paid all non-CN related fines. Safety-Kleen Systems has been appealing the fines for CN violations pending a resolution of the development of a new local limit and/or developing a new site-specific discharge limit for ECSD's POTW NPDES permit.

Attachment V provides the proposed Compliance Monitoring and Inspection Work Plan for 2019. It is anticipated that the District will complete 262 compliance monitoring events based upon completing a monthly sampling event at each of the IUs except for those with low or periodic discharges (GATX #112, Buckeye Terminals #124, and USS Lead #411. Additionally, the District will conduct at least a full site inspection of each IU, as a minimum.

Attachment VI provides a summary of the Organic Scan for the POTW.

The POTW discharge violations for 2018 are summarized in the table below.

| East Chicago Sanitary District<br>Compliance Status Report<br>Report Date Range: 1/1/2018 - 12/31/2018 |   |             |                                       |           |
|--|---|-------------|---------------------------------------|-----------|
| Measure  | Variable  | Exceedances | Limit Description                     | Limit     |
| 108  | EFF FECAL COL (COL/100m)                          | 0           | Daily Maximum Limit                   | >235      |
| 108  | EFF FECAL COL (COL/100m)                          | 0           | Monthly Maximum Limit                 | >125      |
| 109  | EFFLUENT pH (SU)                                  | 0           | Daily Minimum Limit, pH               | <6        |
| 109  | EFFLUENT pH (SU)                                  | 0           | Daily Maximum Limit, pH               | >9        |
| 114  | EFFLUENT TSS (mg/l)                               | 1           | Monthly Maximum Limit                 | >8.5      |
| 114  | EFFLUENT TSS (mg/l)                               | 1           | Weekly Average Maximum Limit          | >12.8     |
| 116  | EFFLUENT T-PHOS (mg/l)                            | 0           | Monthly Maximum Limit                 | >1        |
| 120  | EFFLUENT O & G (mg/l)                             | 0           | Daily Maximum Limit                   | >10       |
| 121  | EFFLUENT D.O. (mg/l)                              | 0           | Daily Minimum Limit, DO winter        | <6        |
| 124  | EFFLUENT CBOD5 (mg/l)                             | 0           | Weekly Average Maximum Limit, winter  | >10.7     |
| 128  | EFFLUENT CN- (mg/l)                               | 0           | Daily Maximum Limit                   | >0.0085   |
| 128  | EFFLUENT CN- (mg/l)                               | 0           | Monthly Maximum Limit                 | >0.0043   |
| 150  | EFF MERCURY, TOTAL RECOVERABLE (ppb)              | 0           | Monthly Average Maximum Limit         | =0.000013 |
| 150  | EFF MERCURY, TOTAL RECOVERABLE (ppb)              | 0           | Daily Maximum Limit                   | =0.000032 |
| 151  | EFF MERCURY, TOTAL RECOVERABLE, LBS/DAY (LBS/DA)  | 0           | Daily Maximum Limit                   | =0.00004  |
| 151  | EFF MERCURY, TOTAL RECOVERABLE, LBS/DAY (LBS/DA)  | 0           | Monthly Average Maximum Limit         | =0.00016  |
| 312  | EFFLUENT CBOD WEEKLY AVERAGE LBS/DAY - Summer (l) | 0           | Weekly Maximum Loading Limit - Summer | =1689.9   |
| 313  | EFFLUENT CBOD WKLY AVG mg/L - Summer (mg/l)       | 0           | Weekly Maximum Limit - Summer         | =7.5      |
| Total  |   | 2           |                                       |           |

Only two NPDES discharge violations were reported at the WWTP. The TSS daily maximum and weekly average were exceeded on one occasion each. No other discharge violations were noted.

**Attachment I - Inspection and Permit Information 2018**

| User  | Outfall | Permit Expiration | SPPC Plan Required | CIU/SIU | Inspection Date | SIC Code   |
|---|---------|-------------------|--------------------|---------|-----------------|------------|
| GATX CORPORATION  | 112     | 10/2/2021         | N                  |         | 8/21/2018       |            |
| EXXON MOBIL OIL COMPANY   | 121     | closed            | N                  |         |                 | 2190       |
| BUCKEYE TERMINALS, LLC  | 124     | 6/14/2019         | N                  |         |                 | 4613       |
| ELECTRIC COATING TECHN.   | 312     | 7/14/2023         | Y                  | CIU/SIU | 12/27/2018      | 3313       |
| W.R. GRACE- CONN  | 401     | 8/31/2021         | Y                  | SIU     | 12/21/2018      | 2819       |
| USS LEAD REFINERY, INC.   | 411     | 10/10/2022        | N                  |         |                 | 3341       |
| TAC EAST, INC   | 415     | 10/3/2022         | Y                  | CIU/SIU | 12/26/2018      | 7699       |
| CENTRAL STATES MARKETING  | 421     | closed 9/1/18     | N                  |         |                 | 511        |
| CMA RECYCLING   | 423     | closed            | N                  |         |                 | 3341       |
| GREEN LAKE TUBE LLC   | 511     | 8/8/2021          | Y                  |         | 12/27/2018      | 3317       |
| NATIONAL PROCESSING   | 514     | 8/8/2021          | Y                  | CIU/SIU | 12/27/2018      | 3312       |
| ICO POLYMERS N.A. INC. (IPNA)   | 518     | 6/6/2022          | Y                  |         |                 | 3089, 3087 |
| LAKESHORE RAILCAR & TANKCAR SERVICES<br>(formerly known as UNITED TRANSPORTATION GROUP) | 521     | 5/30/2023         | Y                  | CIU/SIU | 12/28/2018      | 4785       |
| PRAXAIR, INC., PRODUCTION   | 531     | 11/22/2021        | Y                  |         | 12/28/2018      | 2813       |
| PRAXAIR, INC., RARE GASES   | 541     | 7/31/2021         | Y                  |         | 7/8/2018        | 2813       |
| TRADEBE TREATMENT & RECYC   | 561     | 6/30/2020         | Y                  |         |                 | 4953       |
| ARCELORMITTAL IN HARBOR EAST  | 611     | 1/2/2022          | Y                  |         |                 | 3312       |
| KEMIRA WATER SOLUTIONS  | 702     | closed            | Y                  |         |                 | 2819       |
| INDIANA RADIATOR  | 731     | closed            | N                  |         |                 | 7539       |
| ARCELORMITTAL IN HARBOR EAST  | 804     | 1/2/2022          | Y                  |         | 11/4/2018       | 3312       |
| ARCELORMITTAL IN HARBOR EAST LONG CARB  | 805     | 1/2/2022          | Y                  |         | 11/4/2018       | 3312       |
| SAFETY-KLEEN SYSTEMS  | 901     | 8/21/2023         | Y                  | CIU/SIU | 12/26/2018      | 2992       |
| ARCELORMITTAL IN HARBOR WEST  | 931     | 6/6/2022          | Y                  |         |                 | 3312       |
| ARCELORMITTAL IN HARBOR WEST  | 933     | closed            | N                  |         |                 | 3312       |
| ARCELORMITTAL IN HARBOR WEST  | 934     | 6/6/2022          | Y                  |         |                 | 3312       |
| ARCELORMITTAL IN HARBOR WEST  | 935     | 6/6/2022          | Y                  |         |                 | 3312       |
| UNITED STATES STEEL CORP.   | 936     | 11/21/2021        | Y                  | SIU     |                 | 3312       |
| PRAXAIR, INC., HYDROGEN PLANT   | 941     | 6/21/2020         | Y                  |         | 12/21/2018      | 2813       |
| UNITED STATES GYPSUM CO.  | 951     | 11/21/2021        | Y                  | SIU     | 12/20/2018      | 3275       |

Attachment II - Monitoring 2018

| User   | Outfall       | Compliance Monitoring Events | Industrial Self-Monitoring events | Number of Inspections |
|--|---------------|------------------------------|-----------------------------------|-----------------------|
| GATX CORPORATION   | 112           | 1                            |                                   | 1                     |
| EXXON MOBIL OIL COMPANY  | 121           | closed                       |                                   |                       |
| BUCKEYE TERMINALS, LLC   | 124           | 1                            |                                   |                       |
| ELECTRIC COATING TECHN.  | 312           | 12                           | 2                                 | 1                     |
| W.R. GRACE- CONN   | 401           | 12                           |                                   | 1                     |
| USS LEAD REFINERY, INC.  | 411           | 3                            | 3                                 |                       |
| TAC EAST, INC  | 415           | 12                           | 2                                 | 1                     |
| CENTRAL STATES MARKETING   | 421           | 8                            |                                   |                       |
| CMA RECYCLING  | 423           | closed                       |                                   |                       |
| GREEN LAKE TUBE LLC  | 511           | 12                           |                                   | 1                     |
| NATIONAL PROCESSING  | 514           | 12                           | 1                                 | 1                     |
| ICO POLYMERS N.A. INC. (IPNA)  | 518           | 12                           |                                   |                       |
| LAKESHORE RAILCAR & TANKCAR SERVICES (formerly known as UNITED TRANSPORTATION GROUP) | 521           | 24                           | 8                                 | 1                     |
| PRAXAIR, INC., PRODUCTION  | 531           | 12                           |                                   | 1                     |
| PRAXAIR, INC., RARE GASES  | 541           | 12                           |                                   | 1                     |
| TRADEBE TREATMENT & RECYC  | 561           | 0                            |                                   |                       |
| ARCELORMITTAL IN HARBOR EAST   | 611           | 12                           |                                   | 1                     |
| KEMIRA WATER SOLUTIONS   | 702           | closed                       |                                   |                       |
| INDIANA RADIATOR   | 731           | closed                       |                                   |                       |
| ARCELORMITTAL IN HARBOR EAST   | 804           | 12                           |                                   | 1                     |
| ARCELORMITTAL IN HAR EAST LONG CARBON  | 805           | 13                           |                                   | 1                     |
| SAFETY-KLEEN SYSTEMS   | 901           | 21                           | 2                                 | 1                     |
| ARCELORMITTAL IN HARBOR WEST   | 931           | 14                           |                                   |                       |
| ARCELORMITTAL IN HARBOR WEST   | 933           | closed                       |                                   |                       |
| ARCELORMITTAL IN HARBOR WEST   | 934           | 10                           |                                   |                       |
| ARCELORMITTAL IN HARBOR WEST   | 935           | 12                           |                                   |                       |
| UNITED STATES STEEL CORP.  | 936           | 16                           | 8                                 |                       |
| PRAXAIR, INC., HYDROGEN PLANT  | 941           | 13                           |                                   | 1                     |
| UNITED STATES GYPSUM CO.   | 951           | 13                           |                                   | 1                     |
|  |               |                              |                                   |                       |
|  | <b>Totals</b> | <b>269</b>                   | <b>26</b>                         | <b>15</b>             |

**Attachment III - Pretreatment Performance Summary 2018**

| <b>User</b>  | <b>Outfall</b> | <b>Always Compliant</b> | <b>Minor Non-Compliance</b> | <b>Significant Non-Compliance</b> | <b>Back In Compliance</b> | <b>On Compliance Schedule</b> |
|--|----------------|-------------------------|-----------------------------|-----------------------------------|---------------------------|-------------------------------|
| GATX CORPORATION   | 112            | X                       |                             |                                   |                           |                               |
| BUCKEYE TERMINALS, LLC   | 124            | X                       |                             |                                   |                           |                               |
| ELECTRIC COATING TECHN.  | 312            |                         | X                           |                                   | X                         |                               |
| W.R. GRACE- CONN   | 401            | X                       |                             |                                   |                           |                               |
| USS LEAD REFINERY, INC.  | 411            |                         | X                           |                                   | X                         |                               |
| TAC EAST, INC  | 415            |                         | X                           |                                   | X                         |                               |
| CENTRAL STATES MARKETING   | 421            |                         | X                           |                                   | X                         |                               |
| GREEN LAKE TUBE LLC  | 511            | X                       |                             |                                   |                           |                               |
| NATIONAL PROCESSING  | 514            |                         | X                           |                                   | X                         |                               |
| ICO POLYMERS N.A. INC. (IPNA)  | 518            |                         | X                           |                                   | X                         |                               |
| LAKESHORE RAILCAR & TANKCAR SERVICES (formerly known as UNITED TRANSPORTATION GROUP) | 521            |                         |                             | X                                 | X                         |                               |
| PRAXAIR, INC., PRODUCTION  | 531            |                         | X                           |                                   | X                         |                               |
| PRAXAIR, INC., RARE GASES  | 541            |                         | X                           |                                   | X                         |                               |
| TRADEBE TREATMENT & RECYC  | 561            | X                       |                             |                                   |                           |                               |
| ARCELORMITTAL IN HARBOR EAST   | 611            |                         | X                           |                                   | X                         |                               |
| ARCELORMITTAL IN HARBOR EAST   | 804            | X                       |                             |                                   |                           |                               |
| ARCELORMITTAL IN HAR EAST LONG CARBON  | 805            | X                       |                             |                                   |                           |                               |
| SAFETY-KLEEN SYSTEMS   | 901            |                         |                             | X                                 |                           | X                             |
| ARCELORMITTAL IN HARBOR WEST   | 931            | X                       |                             |                                   |                           |                               |
| ARCELORMITTAL IN HARBOR WEST   | 934            | X                       |                             |                                   |                           |                               |
| ARCELORMITTAL IN HARBOR WEST   | 935            | X                       |                             |                                   |                           |                               |
| UNITED STATES STEEL CORP.  | 936            | X                       |                             |                                   |                           |                               |
| PRAXAIR, INC., HYDROGEN PLANT  | 941            | X                       |                             |                                   |                           |                               |
| UNITED STATES GYPSUM CO.   | 951            |                         | X                           |                                   | X                         |                               |

Attachment IV -Compliance and Enforcement Information 2018

| Sample Date | Outfall | Parameter(s)   | Reported Concentration | Fine Amount |
|-------------|---------|----------------|------------------------|-------------|
| 7/11/2018   | 312     | CN             | 0.0041                 | \$2,000     |
| 8/24/2018   | 411     | bis (2EH)      | 1.4                    | \$1,000     |
| 1/17/2018   | 415     | CN             | 0.005                  | \$1,000     |
| 1/17/2018   | 415     | CN             | 0.005                  | \$1,000     |
| 3/13/2018   | 415     | CN             | 0.007                  | \$1,000     |
| 4/25/2018   | 415     | CN             | 0.009                  | \$1,000     |
| 9/6/2018    | 415     | Cu             | 0.27                   | \$1,000     |
| 6/6/2018    | 421     | CN             | 0.004                  | \$1,000     |
| 7/25/2018   | 421     | Res Cl2        | 0.94                   | No Fine     |
| 8/1/2018    | 421     | Res Cl2        | 0.74                   | No Fine     |
| 3/13/2018   | 514     | Res Cl2        | 0.69                   | No Fine     |
| 5/10/2018   | 514     | Phenol         | 1.5                    | \$1,000     |
| 1/30/2018   | 518     | Res Cl2        | 0.8                    | No Fine     |
| 2/21/2018   | 518     | Res Cl2        | 0.46                   | No Fine     |
| 3/7/2018    | 518     | Res Cl2        | 1                      | No Fine     |
| 6/14/2018   | 518     | CN             | 0.005                  | \$1,000     |
| 1/11/2018   | 521     | CN             | 0.006                  | \$1,000     |
| 1/24/2018   | 521     | CN             | 0.005                  | \$1,000     |
| 2/15/2018   | 521     | CN             | 0.026                  | \$1,000     |
| 2/27/2018   | 521     | CN             | 0.005                  | \$1,000     |
| 3/8/2018    | 521     | CN             | 0.005                  | \$1,000     |
| 6/27/2018   | 521     | CN             | 0.037                  | \$1,000     |
| 7/18/2018   | 521     | Res Cl2        | 2.2                    | \$1,000     |
| 8/15/2018   | 521     | Res Cl2        | 0.88                   | No Fine     |
| 12/19/2018  | 521     | O & G          | 43.1                   | \$1,000     |
| 12/19/2018  | 521     | CN             | 1.0                    | \$1,000     |
| 6/6/2018    | 531     | CN             | 0.004                  | \$1,000     |
| 7/10/2018   | 531     | CN             | 0.0073                 | \$1,000     |
| 7/10/2018   | 541     | CN             | 0.006                  | \$1,000     |
| 3/21/2018   | 611     | Res Cl2        | 0.44                   | No Fine     |
| 7/16/2018   | 611     | pH             | 11.7                   | \$1,000     |
| 1/8/2018    | 901     | CN             | 0.144                  | \$2,500     |
| 1/25/2018   | 901     | CN             | 0.266                  | \$2,500     |
| 2/6/2018    | 901     | CN             | 0.247                  | \$2,500     |
| 2/26/2018   | 901     | CN             | 0.05                   | \$2,500     |
| 3/13/2018   | 901     | CN             | 0.017                  | \$2,500     |
| 3/27/2018   | 901     | CN             | 0.041                  | \$2,500     |
| 4/10/2018   | 901     | CN             | 0.025                  | \$2,500     |
| 4/23/2018   | 901     | Cl2 Res        | 1                      | No Fine     |
| 5/7/2018    | 901     | CN             | 0.044                  | \$2,500     |
| 5/30/2018   | 901     | CN             | 0.078                  | \$2,500     |
| 6/11/2018   | 901     | CN             | 0.028                  | \$2,500     |
| 7/26/2018   | 901     | Hg             | 0.003                  | \$2,500     |
| 7/26/2018   | 901     | CN             | 0.024                  | \$2,500     |
| 7/26/2018   | 901     | Res Cl2        | 0.67                   | No Fine     |
| 8/30/2018   | 901     | CN             | 0.014                  | \$2,500     |
| 9/13/2018   | 901     | CN             | 0.018                  | \$2,500     |
| 9/25/2018   | 901     | Hg, CN, Res Cl | 0.004, 0.016, 2.07     | \$5,000     |
| 10/11/2018  | 901     | CN             | 0.082                  | \$2,500     |
| 10/31/2018  | 901     | CN             | 0.12                   | \$2,500     |
| 11/8/2018   | 901     | CN             | 0.081                  | \$2,500     |
| 2/15/2018   | 951     | CN             | 0.0054                 | \$1,000     |
| 7/12/2018   | 951     | P, CN          | 6.84, 0.0056           | \$2,000     |

\$74,500

**Attachment V - Compliance Monitoring and Inspection Work Plan 2019**

| <b>User</b>  | <b>Outfall</b> | <b>Permit Expiration Date</b> | <b>Compliance Monitoring Events</b> | <b>Industrial Self-Monitoring Events</b> | <b>Number of Inspections</b> |
|--|----------------|-------------------------------|-------------------------------------|--|------------------------------|
| GATX CORPORATION   | 112            | 10/2/2021                     | 6                                   |  | 1                            |
| BUCKEYE TERMINALS, LLC   | 124            | 6/14/2019                     | 6                                   |  | 1                            |
| ELECTRIC COATING TECHN.  | 312            | 7/14/2023                     | 12                                  | 2  | 1                            |
| W.R. GRACE- CONN   | 401            | 8/31/2021                     | 12                                  |  | 1                            |
| USS LEAD REFINERY, INC.  | 411            | 10/10/2022                    | 4                                   |  | 1                            |
| TAC EAST, INC  | 415            | 10/3/2022                     | 12                                  | 2  | 1                            |
| GREEN LAKE TUBE LLC  | 511            | 8/8/2021                      | 12                                  |  | 1                            |
| NATIONAL PROCESSING  | 514            | 8/8/2021                      | 12                                  | 2  | 1                            |
| ICO POLYMERS N.A. INC. (IPNA)  | 518            | 6/6/2022                      | 12                                  |  | 1                            |
| LAKESHORE RAILCAR & TANKCAR SERVICES (formerly known as UNITED TRANSPORTATION GROUP) | 521            | 5/30/2023                     | 18                                  | 2  | 1                            |
| PRAXAIR, INC., PRODUCTION  | 531            | 11/22/2021                    | 12                                  |  | 1                            |
| PRAXAIR, INC., RARE GASES  | 541            | 7/31/2021                     | 12                                  |  | 1                            |
| TRADEBE TREATMENT & RECYC  | 561            | 6/30/2020                     | 0                                   |  | 1                            |
| ARCELORMITTAL IN HARBOR EAST   | 611            | 1/2/2022                      | 12                                  |  | 1                            |
| ARCELORMITTAL IN HARBOR EAST   | 804            | 1/2/2022                      | 12                                  |  | 1                            |
| ARCELORMITTAL IN HAR EAST LONG CARBON  | 805            | 1/2/2022                      | 12                                  |  | 1                            |
| SAFETY-KLEEN SYSTEMS   | 901            | 8/21/2023                     | 24                                  | 2  | 1                            |
| ARCELORMITTAL IN HARBOR WEST   | 931            | 6/6/2022                      | 12                                  |  | 1                            |
| ARCELORMITTAL IN HARBOR WEST   | 934            | 6/6/2022                      | 12                                  |  | 1                            |
| ARCELORMITTAL IN HARBOR WEST   | 935            | 6/6/2022                      | 12                                  |  | 1                            |
| UNITED STATES STEEL CORP.  | 936            | 11/14/2023                    | 12                                  |  | 1                            |
| PRAXAIR, INC., HYDROGEN PLANT  | 941            | 6/21/2020                     | 12                                  |  | 1                            |
| UNITED STATES GYPSUM CO.   | 951            | 11/21/2021                    | 12                                  |  | 1                            |
|  |                |                               |                                     |  |                              |
|  |                |                               |                                     |  |                              |
|  |                |                               | 262                                 | 10                                       | 23                           |

Attachment VI - Summary of Detected Analytes in Organic Scans East Chicago POTW 2018

| Analyte               | Influent |       | Effluent |       | Sludge  |           |
|-----------------------|----------|-------|----------|-------|---------|-----------|
|                       | Results  | Units | Results  | Units | Results | Units     |
| Decachlorobiphenyl    | 650      | mg/L  | 50       | mg/L  | 85      | mg/Kg dry |
| Tetrachloro-m-xylene  | 50       | mg/L  | 100      | mg/L  | 75      | mg/Kg dry |
| 1,2-Dichloroethane-D4 | 97       | µg/L  | 99       | µg/L  | 113     | µg/L      |
| 1,4-Dichlorobenzene   | 0.0008   | mg/L  |          |       |         |           |
| 2-Butanone            | 0.0043   | mg/L  |          |       |         |           |
| 4-Bromofluorobenzene  | 99       | µg/L  | 98.8     | µg/L  | 74.7    | µg/L      |
| 4-Methyl-2-pentanone  | 0.038    | mg/L  |          |       |         |           |
| Acetone               | 0.044    | mg/L  | 0.0025   | mg/L  |         |           |
| Chloroform            | 0.0018   | mg/L  |          |       |         |           |
| Dibromofluoromethane  | 95       | µg/L  | 95.2     | µg/L  | 103     | µg/L      |
| Methylene chloride    | 0.00055  | mg/L  |          |       | 0.13    | mg/Kg dry |
| Toluene               | 0.0012   | mg/L  |          |       |         |           |
| Toluene-D8            | 105      | µg/L  | 104      | µg/L  | 110     | µg/L      |
| 2,4,6-Tribromophenol  | 86.3     | mg/L  | 77.9     | mg/L  | 75.1    | mg/Kg dry |
| 2-Fluorobiphenyl      | 64.6     | mg/L  | 57       | mg/L  | 74.3    | mg/Kg dry |
| 2-Fluorophenol        | 35.4     | mg/L  | 31.6     | mg/L  | 58      | mg/Kg dry |
| 3/4-Methylphenol      | 0.0044   | mg/L  |          |       |         |           |
| Benzoic acid          | 0.0064   | mg/L  |          |       |         |           |
| Benzyl alcohol        | 0.004    | mg/L  |          |       |         |           |
| Nitrobenzene-d5       | 63       | mg/L  | 54.3     | mg/L  | 64.6    | mg/Kg dry |
| Phenol                | 0.002    | mg/L  |          |       |         |           |
| Phenol-d5             | 27.5     | mg/L  | 25.4     | mg/L  | 71      | mg/Kg dry |
| Terphenyl-d14         | 58.4     | mg/L  | 73.4     | mg/L  | 69.7    | mg/Kg dry |
| Heptachlor epoxide    |          |       |          |       | 12      | mg/Kg dry |
| Percent Solids        |          |       |          |       | 25      | wt%       |